

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION**

AUNDRA DEBREL BOYKINS,)

Plaintiff,)

v.)

JEFFERSON DUNN, *et al.*,)

Defendants.)

**Case No. 4:19-CV-1934-ACA
PARTIALLY OPPOSED**

**THE ADOC PARTIES' JOINT MOTION
FOR REDACTION OF CONFIDENTIAL INFORMATION CONTAINED
IN TRANSCRIPT OF MOTION HEARING (FEBRUARY 16, 2023)**

Defendants Commissioner John Hamm (“Commissioner Hamm”), Guy Noe (“Warden Noe”), and Dewayne Estes (“Estes” and, together with Commissioner Hamm and Warden Noe, the “Correctional Officials”) and Defendant Marc Walker (“Walker,” and, together with the Correctional Officials, the “ADOC Parties”) respectfully ask this Court to order redaction of portions of the publicly-filed version of transcript from the Motion Hearing held on February 16, 2023 (Doc. No. 151, the “Hearing”). As grounds for and in support of this motion, the Correctional Officials state as follows:

1. The February 16, 2023, Hearing concerned the ADOC Parties’ Motion for Leave to File Under Seal and Renewed Motion for Leave to File Under Seal (Doc. Nos. 126, 134, the “Motions”) in which the ADOC Parties sought leave to file

their memoranda of law and portions of their evidentiary submissions in support of their forthcoming motions for summary judgment under seal pursuant to the Parties Stipulated Protective Order (doc. no. 77). As such, the Hearing involved in-depth discussions regarding information ultimately filed under seal in connection with those motions.

2. For the same reasons raised in the Motions, the ADOC Parties request that the Court redact portions of the transcript of the Hearing because the Hearing addressed the very matters raised in the Motions. The Hearing transcript contains discussion of information designated Confidential and Highly Confidential – Attorneys’ Eyes Only under the Stipulated Protective Order (doc. no. 77). Public disclosure of that information will compromise the security of ADOC facilities and the safety of inmates, volunteers, and staff at ADOC facilities. Thus, redactions to the transcript remain necessary to limit inappropriate public access to confidential security-related information.

3. The ADOC Parties request extremely limited redactions from the publicly-filed version of the transcript, as set forth in the table below:

Line/Page No(s).	Designation	Justification
64:8-9; 64:11-12	Highly Confidential – Attorneys’ Eyes Only	Security-related concern. The Court sealed similar information in the ADOC Parties’ evidentiary submission (Doc. No. 151).
64:14-23	Highly Confidential – Attorneys’ Eyes Only	Security-related concern. The Court sealed similar

		information in the ADOC Parties' evidentiary submission (Doc. No. 151).
65:11; 65:13; 65:16-17	Highly Confidential – Attorneys' Eyes Only	The Court sealed this content in the ADOC Parties' evidentiary submission (Doc. No. 151).
69:12; 69:20; 70:5-6	Highly Confidential – Attorneys' Eyes Only	The Court sealed this content in the ADOC Parties' evidentiary submission (Doc. No. 151).
69:21-22; 69:24	Highly Confidential – Attorneys' Eyes Only	Security-related concern. The Court sealed similar information in ADOC Parties' evidentiary submission (Doc. No. 151).
70:12-14; 72:22-23	Confidential	Security-related concern. The Court sealed similar information in the ADOC Parties' evidentiary submission (Doc. No. 151).
73:7-10	Confidential	The Court sealed this content in the ADOC Parties' evidentiary submission (Doc. No. 151).
79:22; 79:24; 79:25; 81:6-7; 81:13; 83:3; 83:10; 83:11; 83:18; 83:21; 84:10	Confidential	The Court sealed this content in the ADOC Parties' evidentiary submission (Doc. No. 151).
80:4-5; 80:8	Confidential	Security-related concern. The Court sealed similar information in the ADOC Parties' evidentiary submission (Doc. No. 151).
86:7; 86:16	Confidential	The Court sealed this content in the ADOC Parties' evidentiary submission (Doc. No. 151).

92:14; 92:15; 92:16; 92:18; 101:11	Highly Confidential – Attorneys’ Eyes Only	The Court sealed this content in the ADOC Parties’ evidentiary submission (Doc. No. 151).
95:24-25	Highly Confidential – Attorneys’ Eyes Only	Security-related concern. The Court sealed similar information in the ADOC Parties’ evidentiary submission (Doc. No. 151).

4. Counsel for the ADOC Parties conferred with counsel for Plaintiff, and Plaintiff consented to designating all of the material in the table above as Confidential but opposes designating any portion of it Highly Confidential – Attorneys’ Eyes Only.

WHEREFORE, PREMISES CONSIDERED, the ADOC Parties respectfully request the Court to order redaction of the identified portions of the publicly-filed version of the transcript from the Hearing held on February 16, 2023.

Dated: March 2, 2023.

/s/ M. Landon Whatley

*One of the Attorneys for the Correctional
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon all attorneys of record in this matter, including without limitation the following, by the Court's CM/ECF system on this 2nd day of March, 2023:

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